

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

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JAN 03 2022

KEVIN P. WEIMER, Clerk  
By: *KB*

## UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

Atlanta Division

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

JAN 03 2022

KEVIN P. WEIMER, Clerk  
By: *KB* Deputy ClerkJamie DeJordy

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Gbessia Transportation, Inc., Mamadou Bah, and  
Northland Insurance Company

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

1:22-cv-00018  
(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

**COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE**  
(28 U.S.C. § 1332; Diversity of Citizenship)**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Jamie DeJordy</u>
Street Address	<u>5577 Vincent Gate Terrace - Apt. 1424</u>
City and County	<u>Alexandria</u>
State and Zip Code	<u>Virginia 22312</u>
Telephone Number	<u>347-461-2623</u>
E-mail Address	<u>jdejordy@mac.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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## Defendant No. 1

Name	Gbessia Transportation, Inc.
Job or Title <i>(if known)</i>	
Street Address	225 Johnson Road, Apt. 35D
City and County	Forest Park, Clayton County
State and Zip Code	Georgia 30297
Telephone Number	404-354-4658
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	Mamadou Bah
Job or Title <i>(if known)</i>	Owner/Agent
Street Address	225 Johnson Road, Apt. 35D
City and County	Forest Park, Clayton County
State and Zip Code	Georgia 30297
Telephone Number	404-354-4658
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	Northland Insurance Company
Job or Title <i>(if known)</i>	
Street Address	2 Sun Court - Suite 400
City and County	Peachtree Corners, Gwinnett County
State and Zip Code	Georgia 30092
Telephone Number	800-927-9800
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

## 1. If the plaintiff is an individual

The plaintiff, (name) Jamie DeJordy, is a citizen of the  
State of (name) Virginia.

## 2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**B. The Defendant(s)**

## 1. If the defendant is an individual

The defendant, (name) Mamadou Bah, is a citizen of  
the State of (name) Georgia. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

## 2. If the defendant is a corporation

The defendant, (name) Gbessia Transportation, is incorporated under  
the laws of the State of (name) Georgia, and has its  
principal place of business in the State of (name) Georgia.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):



Plaintiff has suffered specific and general damages caused by Defendants' negligence in an amount that exceeds \$75,000.00.

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) Aug.30 2021 , at (place) Interstate 95 in Maryland ,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

the Defendant operated a tractor trailer truck at very high speed for the wet highway conditons and willfully and violently rear-ended the car operated by Plaintiff, who suffered significant injuries and damages directly caused by Defendants' actions and negligence, which was documented by the Maryand State Police and acknowledged by the Defendants.

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The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

Defendant's actions and negligence, which resulted in Plaintiff's injuries and specific and general damages, including, but not limited to, medical injuries, loss of personal property, and pain, suffering, and emotional damages.

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### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff suffered specific damages of \$93,509.59, as of December 2021, for medical expenses related to injuries suffered by Defendant's negligence with medical expenses continuing at the present time. Plaintiff has also suffered and continues to suffer general damages, including pain and suffering, shock and mental anguish, emotional distress, and general harm caused by Defendant's negligent and wilful action of rear-ending Plaintiff's car causing life threatening and long-lasting general damages exceeding \$1,000,000.00.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/30/2021

Signature of Plaintiff

Printed Name of Plaintiff

Jamie DeJordy

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**Attachment**

**Section II. Basis for Jurisdiction**

**Subsection B. The Defendant(s) – continued**

3. If the Defendant is a corporation  
The Defendant, (name) Northland Insurance Company, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_,  
Or is incorporated under the laws of (foreign nation) Connecticut and registered as a foreign company in Georgia (Control No. H857826) ,  
and has its principal place of business in (name) 2 Sun Court, Suite 400, Peachtree Corners, Georgia 30092.